

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	Chapter 7
)	
TYLER D. KEELY,)	Case No. 20-09856
)	
Debtor.)	Judge Janet S. Baer
)	

NOTICE OF MOTION

TO: Gus A. Paloian
Chapter 7 Trustee
(via Electronic Court Notice)

YOU ARE HEREBY NOTIFIED that on May 21, 2020 at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Janet S. Baer, or any Judge sitting in her stead, in Courtroom 615 at 219 South Dearborn, Chicago, Illinois 60604 and then and there present the attached Motion to Extend Time to File Remaining Schedules and other documents at which time you may appear if you so deem fit.

Any party who objects to this matter and wants the matter called, must file a Notice of Objection no later than 2 business days before the presentment date.

/s/ David H. Cutler

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he caused the above and foregoing Notice and attached Motion to be served on the Trustee via Electronic Court Notice on May 11, 2020.

/s/ David H. Cutler

Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	Chapter 7
)	
TYLER D. KEELY,)	Case No. 20-09856
)	
Debtor.)	Judge Janet S. Baer
)	

**MOTION TO EXTEND TIME TO FILE DEBTOR'S
REMAINING SCHEDULES AND OTHER DOCUMENTS**

NOW COMES the Debtor, Tyler D. Keely, by and through his attorneys, Cutler & Associates, Ltd., and move this Court to grant him until May 27, 2020 to file his remaining Schedules and other documents. In support of this Motion, the Debtor respectfully states and alleges as follows:

1. The Debtor filed his petition for relief under Chapter 7 of the United States Bankruptcy Code on April 26, 2020.
2. The Debtor's remaining schedules and other documents would, in absence of this motion be due on May 11, 2020.
3. The Debtor needs additional time to review the remaining schedules and other documents with his attorneys before they can be filed.
4. The Debtor, therefore, requests that he be granted until May 27, 2020 to file his remaining Schedules and other documents.

WHEREFORE, the Debtor, Tyler D. Keely prays for the following relief:

- A. That the Debtor be granted until May 27, 2020 to file his remaining schedules and other documents; and
- B. For such other and further relief as this Court deems equitable and just.

By: /s/ David H. Cutler
One of the attorneys for the Debtor

Cutler & Associates, Ltd
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600